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IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-56

Chapter 9

Date: October 25, 2018
Time: 9:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13

Judge: Honorable René Lastreto II

THIRD OMNIBUS MOTION FOR ORDER AUTHORIZING REJECTION OF CERTAIN
EXECUTORY CONTRACTS
(PHYSICIAN CONTRACTS 51-98)

TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY
JUDGE:

Tulare Local Healthcare District, doing business as Tulare Regional Medical
Center ("Debtor" or the "District") hereby moves the Court, pursuant to 11 U.S.C. §§
365, 901 and FRBP 6006, for entry of an order:

1. Authorizing the District to reject executory contracts¹ ("Designated

¹ While the District recognizes that the Designated Contracts may not constitute "executory contracts" within the meaning of 11 U.S.C. § 365, the District wishes to reject the Designated Contracts nonetheless out of an abundance of caution and for the avoidance of any doubt.

1 Contracts”) identified in Exhibit “A” (“Exhibit ‘A’”) of the annexed “Declaration of Sanford
2 Haskins” (“Declaration”). Such rejection will be effective upon entry of an Order
3 approving this Motion.

4 This Motion is based on the Motion, the Notice, Memorandum of Points and
5 Authorities, the Declaration of Sanford Haskins in Support of the Motion, the files,
6 pleadings and orders on file in this Chapter 9 case, and such other and further evidence
7 as properly put before the Court.

8 WHEREFORE, the Debtor respectfully requests that the Court enter an order:
9 (1) authorizing the rejection of the Designated Contracts; (2) fixing the date by which
10 any claims based on this Motion must be filed²; and (3) grant such other relief as is just
11 and proper.

12 Dated: September 25, 2018

13 WALTER WILHELM LAW GROUP,
14 a Professional Corporation

15 By:



16 Riley C. Walter

17 Attorneys for Debtor Tulare Local Healthcare
18 District, dba Tulare Regional Medical Center
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27 ² The claims bar date was April 10, 2018. Nothing in the Motion shall be construed as allowing any extension of the
28 claims bar date.